



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

DMP:NJM/SKW
F. #2015R01171

*271 Cadman Plaza East
Brooklyn, New York 11201*

September 19, 2023

By ECF and email

The Honorable Brian M. Cogan
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Kaveh Lotfolah Afrasiabi
Criminal Docket No. 21-46 (BMC)

Dear Judge Cogan:

The government respectfully moves to dismiss the indictment in the above-referenced case pursuant to an Executive Grant of Clemency signed by President Joseph R. Biden, Jr., on September 14, 2023, a copy of which is attached hereto. Because the full pardon conferred therein is conditioned on a number of terms, the government moves that the charges be dismissed without prejudice. The government further joins the defendant's motion to exonerate bond and understands that the defendant will be released from pretrial supervision upon the termination of this action.

Respectfully submitted,

BREON PEACE
United States Attorney

By: /s/
Nicholas J. Moscow
Sara K. Winik
Assistant U.S. Attorneys
(718) 254-7000

cc: Clerk of Court (BMC) (by ECF and email)
Kaveh Lotfolah Afrasiabi (pro se defendant) (by email)
Sabrina Shroff, Esq. (standby counsel) (by email)